

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

)	CRIMINAL NO. 03CR 10395 - WG-4
)	
UNITED STATES OF AMERICA)	VIOLATIONS:
)	18 U.S.C. §922(a)(6)
)	False Statement to Obtain Firearms
)	
V.)	
)	18 U.S.C. §922(g)(3)
)	Possession of a Firearm by a User
KRIS ST. ONGE)	of a Controlled Substance or a
)	Person Addicted to a Controlled
)	Substance

INDICTMENT

COUNT ONE: (18 U.S.C. §922(a)(6) - False Statement to Obtain Firearms)

The Grand Jury charges that:

On or about December 13, 2000, at Brockton, in the District of Massachusetts,

KRIS ST. ONGE,

defendant herein, in connection with the acquisition of a firearm, to wit: a Ceska Zbrojovka Firearms CZ 75B 9mm semi-automatic pistol bearing serial number 5431N, from Fairground Trader, did knowingly make a false and fictitious written statement on Department of the Treasury Form 4473 by signing a "Certificate of Transferee" wherein he certified that he was the "actual buyer" of this firearm, and that he was not an unlawful user of, or addicted to, a controlled substance. These statements were intended and likely to deceive the dealer with

respect to a fact material to the lawfulness of the sale, namely the identity of the actual purchaser of this firearm, and KRIS ST. ONGE'S eligibility to purchase a firearm. In truth and in fact, as KRIS ST. ONGE knew, he was not the actual purchaser of this firearm, and he was a user of and addicted to a controlled substance.

All in violation of Title 18, United States Code, Section 922(a)(6) and Title 18, United States Code, Section 2.

COUNT TWO: (18 U.S.C. §922(a)(6) - False Statement to Obtain Firearms)

The Grand Jury charges that:

On or about January 10, 2001, at Brockton, in the District of Massachusetts,

KRIS ST. ONGE,

defendant herein, in connection with the acquisition of a firearm, to wit: a Smith and Wesson 908 9mm semi-automatic pistol bearing serial number TDM3869, from Fairground Trader, did knowingly make a false and fictitious written statement on Department of the Treasury Form 4473 by signing a "Certificate of Transferee" wherein he certified that he was the "actual buyer" of this firearm, and that he was not an unlawful user of, or addicted to, a controlled substance. These statements were intended and likely to deceive the dealer with respect to a fact material to the lawfulness of the sale, namely the identity of the actual purchaser of this firearm, and KRIS ST. ONGE'S eligibility to purchase a firearm. In truth and in fact, as KRIS ST. ONGE knew, he was not the actual purchaser of this firearm, and he was a user of and addicted to a controlled substance.

All in violation of Title 18, United States Code, Section 922(a)(6) and Title 18, United States Code, Section 2.

COUNT THREE: (18 U.S.C. §922(a)(6) - False Statement to Obtain Firearms)

The Grand Jury charges that:

On or about March 17, 2001, at Brockton, in the District of Massachusetts,

KRIS ST. ONGE,

defendant herein, in connection with the acquisition of a firearm, to wit: a Smith and Wesson 908 9mm semi-automatic pistol bearing serial number VJB4475, from Fairground Trader, did knowingly make a false and fictitious written statement on Department of the Treasury Form 4473 by signing a "Certificate of Transferee" wherein he certified that he was the "actual buyer" of this firearm, and that he was not an unlawful user of, or addicted to, a controlled substance. These statements were intended and likely to deceive the dealer with respect to a fact material to the lawfulness of the sale, namely the identity of the actual purchaser of this firearm, and KRIS ST. ONGE'S eligibility to purchase a firearm. In truth and in fact, as KRIS ST. ONGE knew, he was not the actual purchaser of this firearm, and he was a user of and addicted to a controlled substance.

All in violation of Title 18, United States Code, Section 922(a)(6) and Title 18, United States Code, Section 2.

COUNT FOUR: (18 U.S.C. §922(a)(6) - False Statement to Obtain Firearms)

The Grand Jury charges that:

On or about July 24, 2001, at Middleboro, in the District of Massachusetts,

KRIS ST. ONGE,

defendant herein, in connection with the acquisition of a firearm, to wit: a Smith and Wesson CS40 .40 caliber semi-automatic pistol bearing serial number VJB4042, from Middleboro Gun Shop, did knowingly make a false and fictitious written statement on Department of the Treasury Form 4473 by signing a "Certificate of Transferee" wherein he certified that he was the "actual buyer" of this firearm, and that he was not an unlawful user of, or addicted to, a controlled substance. These statements were intended and likely to deceive the dealer with respect to a fact material to the lawfulness of the sale, namely the identity of the actual purchaser of this firearm, and KRIS ST. ONGE'S eligibility to purchase a firearm. In truth and in fact, as KRIS ST. ONGE knew, he was not the actual purchaser of this firearm, and he was a user of and addicted to a controlled substance.

All in violation of Title 18, United States Code, Section 922(a)(6) and Title 18, United States Code, Section 2.

COUNT FIVE: (18 U.S.C. §922(a)(6) - False Statement to Obtain Firearms)

The Grand Jury charges that:

On or about July 27, 2001, at Brockton, in the District of Massachusetts,

KRIS ST. ONGE,

defendant herein, in connection with the acquisition of a firearm, to wit: a Smith and Wesson SW40P .40 caliber semi-automatic pistol bearing serial number PBF5181, from Fairground Trader, did knowingly make a false and fictitious written statement on Department of the Treasury Form 4473 by signing a "Certificate of Transferee" wherein he certified that he was the "actual buyer" of this firearm, and that he was not an unlawful user of, or addicted to, a controlled substance. These statements were intended and likely to deceive the dealer with respect to a fact material to the lawfulness of the sale, namely the identity of the actual purchaser of this firearm, and KRIS ST. ONGE'S eligibility to purchase a firearm. In truth and in fact, as KRIS ST. ONGE knew, he was not the actual purchaser of this firearm, and he was a user of and addicted to a controlled substance.

All in violation of Title 18, United States Code, Section 922(a)(6) and Title 18, United States Code, Section 2.

COUNT SIX: (18 U.S.C. §922(a)(6) - False Statement to Obtain Firearms)

The Grand Jury charges that:

On or about July 28, 2001, at Middleboro, in the District of Massachusetts,

KRIS ST. ONGE,

defendant herein, in connection with the acquisition of a firearm, to wit: a SigSauer P-239 .40 caliber semi-automatic pistol bearing serial number SA485376, from Middleboro Gun Shop, did knowingly make a false and fictitious written statement on Department of the Treasury Form 4473 by signing a "Certificate of Transferee" wherein he certified that he was the "actual buyer" of this firearm, and that he was not an unlawful user of, or addicted to, a controlled substance. These statements were intended and likely to deceive the dealer with respect to a fact material to the lawfulness of the sale, namely the identity of the actual purchaser of this firearm, and KRIS ST. ONGE'S eligibility to purchase a firearm. In truth and in fact, as KRIS ST. ONGE knew, he was not the actual purchaser of this firearm, and he was a user of and addicted to a controlled substance.

All in violation of Title 18, United States Code, Section 922(a)(6) and Title 18, United States Code, Section 2.

COUNT SEVEN: (18 U.S.C. §922(g)(3) - (Possession of a Firearm by a User of a Controlled Substance or a Person Addicted to a Controlled Substance)

The Grand Jury charges that:

On or about December 13, 2000, at Brockton, in the District of Massachusetts,

KRIS ST. ONGE,

defendant herein, did, knowingly possess in and affecting commerce a firearm, to wit: a CZ 75B 9mm semi-automatic pistol bearing serial number 5431N, while he was a user of and addicted to a controlled substance, to wit, heroin.

All in violation of Title 18, United States Code, Section 922(g)(3) and Title 18, United States Code, Section 2.

COUNT EIGHT: **(18 U.S.C. §922(g)(3) - (Possession of a Firearm
by a User of a Controlled Substance or a Person
Addicted to a Controlled Substance)**

The Grand Jury charges that:

On or about July 27, 2001, at Brockton, in the District of
Massachusetts,

KRIS ST. ONGE,

defendant herein, did, knowingly possess in and affecting
commerce a firearm, to wit: a Smith and Wesson SW40P .40 caliber
semi-automatic pistol bearing serial number PBF5181, while he was
a user of and addicted to a controlled substance, to wit, heroin.

All in violation of Title 18, United States Code, Section
922(g)(3) and Title 18, United States Code, Section 2.

COUNT NINE: (18 U.S.C. §922(g)(3) - (Possession of a Firearm
by a User of a Controlled Substance or a Person
Addicted to a Controlled Substance)

The Grand Jury charges that:


On or about July 28, 2001, at Middleboro, in the District of
Massachusetts,

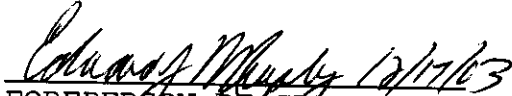
KRIS ST. ONGE,

defendant herein, did, knowingly possess in and affecting
commerce a firearm, to wit: a SigSauer P-239 .40 caliber semi-
automatic pistol bearing serial number SA485376, while he was a
user of and addicted to a controlled substance, to wit, heroin.

All in violation of Title 18, United States Code, Section
922(g)(3) and Title 18, United States Code, Section 2.

A TRUE BILL


Seth P. Berman
Assistant U.S. Attorney


FOREPERSON OF GRAND JURY

DISTRICT OF MASSACHUSETTS, Boston, December 17, 2003. @ 3:47 PM

Returned into the District Court by the Grand Jurors and filed.


Deputy Clerk

JS 45 (5/97) - (Revised USAO MA 3/25/02)

Criminal Case Cover Sheet**U.S. District Court - District of Massachusetts**Place of Offense: _____ Category No. II Investigating Agency ATFCity Brockton and Middleboro**Related Case Information:**County PlymouthSuperseding Ind./ Inf. N/A Case No. N/A
Same Defendant N/A New Defendant N/A
Magistrate Judge Case Number N/A
Search Warrant Case Number N/A
R 20/R 40 from District of N/A**Defendant Information:**Defendant Name KRIS ST. ONGEJuvenile ☐ Yes ☒ No

Alias Name _____

Address 12 Lilly Avenue, Brockton, MA 02301Birth date: 1966 SS#: 8537 Sex: M Race: WH Nationality: USA

Defense Counsel if known: _____

Address: _____

Bar Number: _____

U.S. Attorney Information:AUSA Seth P. BermanBar Number if applicable 629332Interpreter: ☐ Yes ☒ No

List language and/or dialect: _____

Matter to be SEALED: ☐ Yes ☒ No☒ Warrant Requested☐ Regular Process☐ In Custody

Location Status: _____

Arrest Date: _____

☐ Already in Federal Custody as _____ in _____☐ Already in State Custody _____ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by _____ on _____Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty _____ ☐ Misdemeanor _____ ☒ Felony Nine

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 12/17/03Signature of AUSA: [Signature]

JS 45 (5/97) - (Revised USAO MA 3/25/02) Page 2 of 2 or Reverse

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant KRIS ST. ONGE

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 U.S.C. §922(a)(6)</u>	<u>False Statements to Obtain Firearms</u>	<u>One through Six</u>
Set 2	<u>18 U.S.C. §922(g)(3)</u>	<u>Possession of a Firearm by a User of a</u>	<u>Seven through Nine</u>
Set 3	_____	<u>Controlled Substance or a Person Addicted to</u>	_____
Set 4	_____	<u>a Controlled Substance</u>	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: _____